

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

200 Park Avenue
New York, NY 10166-0193
Tel 212.351.4000
gibsondunn.com

David P. Salant
Direct: +1 212.351.2486
Fax: +1 212.817.9586
DSalant@gibsondunn.com

January 29, 2024

VIA ECF

The Honorable Valerie Figueredo, U.S.M.J.
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1660
New York, NY 10007

Re: GateGuard, Inc. v. Amazon.com, Inc., No. 21 Civ. 9321 (JGK) (VF)

Dear Judge Figueredo:

Pursuant to Rule I.g.2 of the Court's Individual Practices in Civil Cases, Defendants Amazon.com, Inc., Amazon.com Services LLC, and Amazon Logistics, Inc. (collectively, "Amazon") respectfully submit this letter-motion to file under seal portions of its forthcoming pre-motion letter regarding Plaintiff GateGuard, Inc.'s responses to Amazon's trade-secret-related interrogatories.

Amazon's forthcoming pre-motion letter quotes and attaches as exhibits discovery materials GateGuard marked "Highly Confidential – Attorneys' Eyes Only" pursuant to the Court's Protective Order, ECF No. 39. While Amazon does not believe these materials must be filed under seal, it makes this motion in observance of GateGuard's confidentiality designations. *See* ECF No. 39 ¶ 14.

Amazon will simultaneously file a proposed public version of its letter and exhibits, redacting the text GateGuard designated for confidentiality.


We thank the Court for its consideration.

Respectfully submitted,

/s/ David Salant
David Salant

CC: All counsel of record (via ECF)

Application Granted



Valerie Figueredo, U.S.M.J.

DATED: February 2, 2024

The Clerk of Court is respectfully directed to terminate the motion at ECF No. 98.